

KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

Attorneys for Receiver, Geoff Winkler

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
**ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICES,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; ROLAND TANNER; LARRY
JEFFERY; JASON A. JENNE; SETH
JOHNSON; CHRISTOPHER M. MADSEN;
RICHARD R. MADSEN; MARK A.

Case No.: 2:22-cv-00612-CDS-EJY

Judge: Cristina D. Silva
Magistrate Judge: Elayna J. Youchah

**STIPULATION AND ORDER
CONCERNING CAMERON
ROHNER LIVING EXPENSES**

MURPHY; CAMERON ROHNER; AND
WARREN ROSEGREEN;

Defendants; and

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2 INVESTMENTS,
LLC; ROCKING HORSE PROPERTIES,
LLC; TRIPLE THREAT BASKETBALL,
LLC; ACAC LLC; ANTHONY MICHAEL
ALBERTO, JR.; and MONTY CREW LLC;

Relief Defendants.

WHEREAS, on June 29, 2022, Plaintiff United States Securities and Exchange Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Amended Complaint in this matter, alleging violations of the registration and/or antifraud provisions of the federal securities laws by Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt. No. 118.)

WHEREAS, on June 29, 2022, the Commission filed a Motion to Amend Preliminary Injunction Order to extend the existing preliminary injunctive relief and asset freeze to those defendants added in the Commission’s Amended Complaint. (Dkt. No. 119.)

WHEREAS, on June 29, 2022, the Commission filed a Motion to Amend Receivership Order to extend the existing receivership order to include those defendants added in the Commission’s Amended Complaint. (Dkt. No. 120.)

WHEREAS, on July 29, 2022, the Court issued its Order Amending Preliminary Injunction and Asset Freeze Order, which, *inter alia*, extended the asset freeze imposed by the Court on April 13, 2022 to those defendants added in the Commission’s Amended Complaint. (Dkt. No. 206.) The Court’s Order provided for “an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice and an opportunity for the Commission to be heard.”

WHEREAS, on July 29, 2022, the Court issued its Order Amending Receivership Order, which, *inter alia*, extended the receivership previously imposed by the Court to the assets of those defendants added in the Commission’s Amended Complaint. (Dkt. No. 207.)

1 **WHEREAS**, at the hearing before the Court on July 25, 2022, the Court directed the parties
2 to discuss any exceptions to the asset freeze regarding living expenses and so as to ensure the scope
3 of the preliminary injunction was tied to the underlying Ponzi scheme.

4 **WHEREAS**, counsel to the Commission, Defendant Cameron Rohner, and the Receiver
5 have reached the following agreement as to an allowance for living expenses, and jointly provide
6 this proposed agreement for approval by the Court:

- 7 1. Chase Bank Checking Account No. *****0553 (the “Chase Checking Account”)
8 held in the name of Cameron Rohner shall be unfrozen to allow Defendant Cameron
9 Rohner to pay living expenses and hold going-forward, earned income unconnected
10 to the conduct alleged in the Complaint;
- 11 2. Defendant Cameron Rohner may withdraw up to \$6,630 per month—representing
12 all of the IRS 2021 Allowable Living Expenses National Standards for a family of
13 six (6)—of previously-frozen funds from the Chase Checking Account until
14 January 31, 2023 for necessary and reasonable living expenses;
- 15 3. Defendant Cameron Rohner must provide to counsel to the Commission, without
16 further request or subpoena, the monthly account statements of the Chase Checking
17 Account for review and inspection by no later than the 5th of each month this
18 stipulation is in effect. The Chase Checking Account statements shall be provided
19 to counsel to the Commission by email to Casey R. Fronk (fronkc@sec.gov), Tracy
20 S. Combs (combst@sec.gov), and to the Receiver
(geoff@americanfiduciaryservices.com);
- 21 4. To the extent Defendant Cameron Rohner earns additional, going-forward income
22 that he demonstrates, to the satisfaction of counsel for the Commission, is
23 unconnected to the conduct alleged in the Complaint, such income may be used for
24 the payment of necessary and reasonable living expenses, reasonable business
25 expenses related to those sources of income, and payment of attorney’s fees and
26 defense costs. As of the date of this stipulation, this includes the following sources
27 of income:

- a. Cameron Rohner, LLC d/b/a The Stone Company.
b. All checking accounts held or owned solely by Amber Rohner.

DATED this 17th day of August, 2022.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

By: _____
KARA B. HENDRICKS, Bar No. 07743
JASON K. HICKS, Bar No. 13149
KYLE A. EWING, Bar No. 014051
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

Attorneys for Receiver Geoff Winkler

DATED this 17th day of August, 2022.

SECURITIES & EXCHANGE
COMMISSION

/s/ Casey R. Fronk

By: _____
TRACY S. COMBS, ESQ.
(California Bar No. 298664)
CASEY R. FRONK, ESQ.
(Illinois Bar No. 6296535)
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel: (810) 524-5796
Fax: (810) 524-3558

*Attorneys for Petitioner U.S. Securities and
Exchange Commission*

DATED this 17th day of August, 2022.

JACKSON WHITE, P.C.

/s/ David C. Clukey

By: _____
DAVID C. CLUKEY, *PRO HAC*
40 N. Center Street, Suite 200
Mesa, AZ 85201

Attorneys for Defendant Cameron Rohner

IT IS SO ORDERED:



CRISTINA D. SILVA
UNITED STATES DISTRICT JUDGE

DATED: August 19, 2022